

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: :
Jerry Johnson : Chapter 13
: Case No. 24-12610-PMM
Debtor :

RESPONSE TO MOTION FOR RELIEF OF THE AUTOMATIC STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied. The subject property is a corner property known as 557 Chester Street and/or 509 East Strawberry Street and is the Debtor's residence.
8. Admitted.
9. Denied. See answer to paragraph #7.
10. Denied.
11. Denied.
12. Denied.
13. Admitted.
14. Admitted.
15. Admitted.
16. Admitted.
17. Denied, In re Williams, 06-10928 (Bankr. E.D. Pa. 2006).
18. Admitted.
19. Denied.
20. Denied.
21. Denied. By way of further answer the subject Chapter 13 Plan intends to sell the investment property at 9 Locust Street, Lancaster, PA, to satisfy the movant's claim.
22. Denied.
23. Denied.

24. Denied.
25. Denied.
26. Denied.
27. Denied.
28. Denied.
29. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order Granting Relief from the Automatic Stay in the instant Bankruptcy matter.

Respectfully submitted,

Dated: October 02, 2024

/s/ Brad J. Sadek, Esquire

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